

AMERICAN CREOSOTE METAIRIE, LA

This 17-acre site, in Jefferson Parish, Louisiana, on the east bank of the Mississippi River near the Orleans Parish/Jefferson Parish line, was a pressurized-vessel creosote wood treating facility from 1909 to 1958. After the plant closed, the land was purchased, razed, and converted into an industrial park. Jefferson Parish constructed a 1/2 mile-long dead-end public road down the middle of the site property, naming it “Industrial Avenue”, with subsurface storm-water drainage flowing northward away from River Road and the Mississippi River levy. Topsoil was added, utilities were installed, and the lots were sold; and River Road Industrial Park became a reality. Approximately 25 separate property parcels now line both sides of Industrial Avenue, owned or leased by a gamut of established repair, service, and storage-type businesses.

Creosote soil contamination near the site became an issue in the early ‘90s when common constituents that make up creosote, called poly-cyclical aromatic hydrocarbons (PAHs) some classified as carcinogens, were discovered in the sediments of Hoey Canal, the storm-water pathway between the site and Lake Pontchartrain to the north. In 1995, EPA performed a site inspection, scoring the site less than one for National Priority List (NPL) ranking purposes. The site was not deemed eligible for Federal Superfund monies.

In 1996, Jefferson Parish discovered free-phase creosote while excavating the north end of Industrial Avenue to convert a final section of open-ditch storm-water drainage to a closed culvert system. Excavation was halted and discussions began between the parish, LDEQ, and the Industrial Avenue property owners.

The following is a summary of major events preceding initiation of the VRP at this site:

- 1) The LDEQ conducted and paid for a RECAP investigation of the storm-water drainage pathway at the north end of the site, to resolve the question of protection of

human health during and following completion of the storm-water culvert system installation,

- 2) Jefferson Parish then redesigned and installed the culvert system in conformation with RECAP standards,
- 3) The River Road Industrial Park property owners were saddled with the responsibility for any remaining environmental cleanup of their properties deemed necessary for the protection of human health---a tall order, because this posed potentially a huge cost to each property owner individually, and threatened to interfere with their daily business operations.

LOUISIANA VOLUNTARY REMEDIATION PROGRAM

The Louisiana Legislature enacted the VRP to encourage the private sector to step forward to investigate and remediate environmentally impacted (Brownfields) properties, so that these properties could be safely put back into use. LDEQ then promulgated VRP regulations in 2001. The River Road Industrial Park property owners were one of the first groups in the state to enroll in the VRP, successfully complete each phase of the program, and thereby gain full benefit of the advantages offered by the program. The property owners joined together as a working group, calling themselves the Forum to Advance Industrial Avenue Remediation (FAIR) Trust. They pooled their resources, hired legal council and employed an environmental contractor. The FAIR Trust researched the history of the creosote site. Sanborn maps of the site, dated 1929, revealed the precise on-site locations of the above-ground creosote storage tanks, the retort treatment vessels, and the drip area where freshly treated lumber was stored right after treatment. These documents allowed the property owners to focus their VRP environmental investigation on those areas where soil and groundwater would most likely be impacted based on previous land-use practices. A site VRP investigation work plan was submitted to LDEQ, reviewed and approved in March 2001. The site investigation was conducted during the summer 2001, and a VRP investigation report and remediation work plan called the Site Investigative Report and Remediation Plan (SIRRP) was prepared and submitted to LDEQ for review and approval. Once approved, this

report/work plan was published in the local newspapers for public comment. Following expiration of the comment period, the SIRRP was granted final approval by LDEQ in January 2002.

The VRP remediation work plan was implemented during the summer 2002. Contaminated surface soils were excavated from the retort vessel area, and disposed of off-site. This area and two other soil-impacted areas were then capped with six-inch thick reinforced Portland concrete, as specified in the VRP remediation work plan. The FAIR Trust developed and endorsed institutional controls for their properties, designed to restrict specific types of practices on any of the FAIR Trust properties in the future, thereby managing risk of exposure to residual creosote constituents remaining in the ground or groundwater. These institutional controls were filed with the Jefferson Parish Clerk of Court for each of the Industrial Avenue properties that participated in the FAIR Trust, providing a degree of permanence to these controls over time and any future property transfers.

The FAIR Trust property owners received their VRP Certificate of Completion from LDEQ on June 4, 2003. The VRP remedial actions were accomplished with limited inconvenience to the individual businesses along Industrial Avenue, and none were required to cease operations for any length of time during the process.



Looking West at excavation area on AOC-1



Looking west at excavation area after back fill AOC-1



Looking West at excavation area after cement cover of AOC-1